

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE STELLANTIS N.V.
SECURITIES LITIGATION

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19-CV-6770 (EK) (VMS)

**NOTICE OF LEAD PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT, PRELIMINARY CERTIFICATION
OF SETTLEMENT CLASS, AND
APPROVAL TO PROVIDE NOTICE TO THE CLASS**

PLEASE TAKE NOTICE that Lead Plaintiff Nicholas S. Panitza (“Lead Plaintiff”), on behalf of himself and all others similarly situated, respectfully moves this Court for an order: (i) granting preliminary approval of the (i) preliminary approval of the proposed Settlement set forth in the Stipulation and Agreement of Settlement dated May 14, 2021 (the “Stipulation”); (ii) certification of the proposed Settlement Class; (iii) approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iv) the scheduling of a hearing date (“Settlement Fairness Hearing”) at which the Court will consider (a) final approval of the Settlement and entry of the proposed Final Judgment Approving Class Action Settlement, (b) the Plan of Allocation of settlement proceeds, and (c) Lead Counsel’s application for an award of attorneys’ fees and Litigation Expenses and award of costs to Lead Plaintiff relating to his representation of the Class.

This motion is based on this Notice of Motion, Lead Plaintiff’s supporting Memorandum of Law, the Stipulation and all exhibits attached thereto, and the Declaration of Stephanie M. Beige, all filed contemporaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion.

Defendants do not oppose the relief sought by this motion. Accordingly, Lead Plaintiff requests that the Court enter the attached proposed Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice.

DATED: May 14, 2021

Respectfully submitted,

BERNSTEIN LIEBHARD LLP

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*Lead Counsel for Lead Plaintiff and the Proposed
Class*

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2021, a true and correct copy of the foregoing **NOTICE OF LEAD PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, PRELIMINARY CERTIFICATION OF SETTLEMENT CLASS AND APPROVAL TO PROVIDE NOTICE TO THE CLASS** was filed with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to counsel of record.

Executed on May 14, 2021

/s/ Stephanie Beige
Stephanie Beige